

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

REALTRUST IRA ALTERNATIVES, )  
LLC, f/k/a ENTRUST NORTHWEST, LLC,) )  
Plaintiff, ) ) Civil Action No.  
v. ) ) 1:10-cv-00382-LM  
THE ENTRUST GROUP, )  
INTERNATIONAL BANK & )  
TRUST, and MECHANICS BANK, )  
Defendants. )  
\_\_\_\_\_  
)

**PLAINTIFF'S NOTICE OF INTENT TO FILE SUR-REPLY**

Plaintiff, RealTrust IRA Alternatives, LLC f/k/a Entrust Northwest, LLC, (“ENW”), by its attorneys, Donovan Hatem LLP, hereby submits this Notice of Intent to file a surreply memorandum to rebut the arguments raised in defendant, Mechanics Bank’s (“Mechanics”) Reply to Plaintiff’s Objection to Mechanic’s Motion to Dismiss. A sur-reply would greatly assist the Court in ruling on the Motion(s) to Dismiss as the Reply Memoranda have raised issues to which ENW can respond with well-supported case law. Given the issues explored in this matter and the impact upon the general public, a sur-reply will help put the applicable case law into perspective.

Respectfully submitted,

RealTrust IRA Alternatives,  
LLC f/k/a Entrust Northwest,  
LLC  
By its attorneys,

/s/ John W. Dennehy  
John W. Dennehy  
DONOVAN HATEM LLP  
Two Seaport Lane  
Boston, MA 02210  
(617) 406-4500

Dated: January 7, 2011

**CERTIFICATE OF SERVICE**

I certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), this 7<sup>th</sup> day of January, 2011.

/s/ John W. Dennehy  
John W. Dennehy